

CALIFORNIA CIVIL RIGHTS LAW GROUP

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Attorneys for Plaintiffs,
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**DECLARATION OF LAWRENCE
ORGAN IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT
NEXTSOURCE, INC.'S MOTION FOR
SUMMARY JUDGEMENT, OR IN THE
ALTERNATIVE FOR SUMMARY
ADJUDICATION OF ISSUES**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 201

1 I, LAWRENCE ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Declaration in support of
5 Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I have personal
6 knowledge of the facts stated herein and if called upon to testify, I could and would competently
7 testify thereto, except as to those matters that are stated upon information and belief.
8

9 2. Attached hereto and marked as Exhibit 1 is a true and correct copy of a document
10 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates-stamped
11 CITISTAFF0000034-CITISTAFF0000035.
12

13 3. Attached hereto and marked as Exhibit 2 is a true and correct copy of various
14 excerpts from the deposition of Monica De Leon.

15 4. Attached hereto and marked as Exhibit 3 is a true and correct copy of various
16 excerpts from the deposition of Tamotsu Kawasaki.
17

18 5. Attached hereto and marked as Exhibit 4 is a true and correct copy of various
19 excerpts from the deposition of Edward Romero.

20 6. Attached hereto and marked as Exhibit 5 is a true and correct copy of various
21 excerpts from the deposition of Kevin McGinn.
22

23 7. Attached hereto and marked as Exhibit 6 is a true and correct copy of various
24 excerpts from the deposition of Victor Quintero.

25 8. Attached hereto and marked as Exhibit 7 is a true and correct copy of various
26 excerpts from the deposition of Wayne Jackson.

27 9. Attached hereto and marked as Exhibit 8 is a true and correct copy of various
28 excerpts from the deposition of Michael Wheeler.

1 10. Attached hereto and marked as Exhibit 9 is a true and correct copy of Defendant
2 Tesla, Inc, dba Tesla Motors, Inc.'s Responses to Plaintiff Owen Diaz's Interrogatories, Set
3 Three.

4 11. Attached hereto and marked as Exhibit 10 is a true and correct copy of Defendant
5 nextSource, Inc,'s Responses to Plaintiff Owen Diaz's Requests for Production of Documents,
6 Set One.
7

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct. Executed on November 19, 2019 in San Anselmo, California.
10

11
12 DATED: November 19, 2019

By: /s/ Lawrence Organ
Lawrence A. Organ, Esq.
Navruz Avloni, Esq.
J. Bernard Alexander, Esq.
Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ